NORTHWEST HORTICULTURAL COUNCIL
6 SOUTH 2ND STREET, ROOM 903
YAKIMA, WASHINGTON 98901
(509) 453-3193
FAX (509) 457-7615

September 3, 2002

Mr. Richard Matthews, Program Manager
National Organic Program
USDA Agricultural Marketing Service
Room 2510 South Building
1400 Independence Avenue SW
Washington, DC 20250

Dear Mr. Matthews:

I am writing to you on behalf of over 250 certified organic apple and pear growers represented by the Northwest Horticultural Council who currently produce fruit on approximately 10,000 acres in the states of Idaho, Oregon and Washington. We understand that the presence of certain inert ingredients in currently available pheromone dispensers may disqualify their use in certified organic orchards under the new National Organic Standards due to go into effect next month. This would result in the loss of mating disruption as an effective pest control tool for codling moth, causing serious harm to organic fruit producers in the Pacific Northwest as no comparably effective and approved alternatives are currently available.

As you may know, codling moth is the proverbial worm in apples and pears. In this region codling moth can infest 80 percent or more of the fruit if not controlled. Over half of the apple growers in the Washington certification program in the early 1990's abandoned organic production by 1992 mainly because of heavy losses to codling moth. The Pacific Northwest has seen a rapid and dramatic rise in organic apple and pear acreage during the past 5-7 years primarily because improved pheromone dispenser systems for codling moth mating disruption have become available that result in high levels of codling moth control. Much of the recent improvement in control is due to the added presence of inert ingredients that increase the longevity of dispenser performance. Pheromone dispensers are physically placed on branches in the upper portion of the tree canopy at the rate of approximately one per tree and their contents are not directly applied to the harvested crop or the land. In addition, the U.S. EPA does not classify the inerts used in the most widely applied products as inerts of toxicological concern. We therefore believe pheromone dispenser systems meet the intent of the Federal Organic Foods Production Act of 1990 for inclusion on the National List.

Based on our experience, the inability to use codling moth mating disruption or the use of less effective pheromone dispensers without these inert ingredients would result in major crop losses to organic pome fruit growers, collateral damage to neighboring orchards and eventual withdrawal from certification for many producers. We therefore urge the National Organic Standards Board to adopt a new policy that exempts the pheromone formulations

currently used in mating disruption from the prohibition on synthetic inert ingredients and to affirmatively state that mating disruption dispenser systems are an allowed method of pest control in organic orchards.

Thank you for your anticipated consideration of our concerns. Please do not hesitate to contact our office if you have any questions or need additional information regarding this issue.

Sincerely,
NORTHWEST HORTICULTURAL COUNCIL

Dr. Michael J. Willett
Vice President for Scientific Affairs

cc: NHC Trustees and Member Secretaries
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